

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

IN RE BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION

No. MD-15-02641-PHX-DGC

This Document Relates to Plaintiff Susan

Collis and Gerald Collis, 2:17-cv-01209-DGC

**PLAINTIFF'S UNOPPOSED MOTION TO TERMINATE PARTY
AND AMEND THE COMPLAINT**

Plaintiff Susan Collis, by and through undersigned counsel, and pursuant to FRCP 25(a) and 15(a)(2) hereby move the Court to terminate Gerald Collis, as Plaintiff by way of an Amended Short Form Complaint in the form attached hereto as Exhibit 1, and in support, states as follows:

1. Plaintiff Susan Collis was implanted with a Bard IVC Filter and subsequently discovered injuries in 2016. Plaintiff retained undersigned counsel, who filed a Complaint on her behalf against the Defendants for Plaintiff's IVC Filter-related injuries.
 2. This case is part of a settlement with Bard.
 3. Plaintiff's spouse, Gerald Collis was also named as a plaintiff in this action for damages, including loss of consortium.
 4. Gerald Collis unexpectedly passed away July 12, 2017.
 5. Plaintiff hereby submits an Amended Short Form Complaint, attached hereto as Exhibit 1, which terminates Gerald Collis as Plaintiff, along with any claims for

1 damages associated with Gerald Collis.

2 6. The death certificate of Gerald Collis is attached as Exhibit A to the Amended
3 Short Form Complaint.

4 7. Counsel for Defendants has indicated that they have no objection to this motion.

5 WHEREFORE, Plaintiff respectfully requests that this Court grant Plaintiff's Unopposed
6 Motion to Terminate Party and Amend the Complaint and order the Clerk to file the
7 Amended Short Form Complaint, attached hereto as Exhibit 1.

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11 DATED: 09/21/2020

Respectfully Submitted,

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13 /s/ Stuart L. Goldenberg
14 Stuart L. Goldenberg (*pro hac vice*)
15 Marlene J. Goldenberg (*pro hac vice*)
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